

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE: * CASE NO. 23-03241-ESL
*
RIC F. MALIK * CHAPTER 7
*
Debtor(s). *
*

MOTION TO SHOW CAUSE [53]

TO THE HONORABLE ENRIQUE S. LAMOUTTE, US BANKRUPTCY JUDGE:

NOW COME(S), debtor(s), through his(their) undersigned attorney and respectfully state(s) as follows:

1. Debtor tendered to creditors Earl Geertgens and Tama Geertgens' their discovery requests hand delivering the same to the office of Warren Wolf, Esquire, creditors' counsel, see [55, 58, 61].
2. This Honorable Court has entered an Order [63] directing at Warren Wolf, Earl Geertgens, and the Chapter 7 Trustee to state position as to Debtor's motion to vacate order to show cause [61].
3. Creditors have also filed an adversary case 24-15-ESL related to substantially the same issues raised in this core case.
4. Debtor had requested that to avoid duplicate discovery efforts, suggested to this Honorable Court that discovery be limited to one case, the adversary one [45].
5. The court declined at that juncture to limit discovery to only one case [46].
6. Since the issues are substantially the same, a modification

of the request would be to avoid duplicate requests in both cases so that for example a question would only be asked once not twice depending to which case it was referring to.

WHEREFORE, debtor(s) through his(their) undersigned attorney respectfully request(s) that for the above stated reasons this Honorable Court note what is stated above and find that Debtor has personally complied with creditors Earl Geertgens and Tama Geertgens' discovery request.

Respectfully submitted in Carolina, Puerto Rico, on March 5, 2025.

CERTIFICATE OF SERVICE, P.R. LBR 9013-3

I hereby certify that on this day, I electronically filed the foregoing with the Clerk of the Court uploading the same using the CM/ECF System which will send notification of such filing to all parties of record registered in the use of the CM/ECF system.

FREDERIC CHARDON DUBOS LAW OFFICE

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